

M.J.J. v. Polk County Sheriff's Department, Darryl L.
Christensen

15-C-433

Transcript of the Video Deposition of:

April 5, 2016



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4/5/2016

Page 14

Page 44

1 yourself, oh, half of the first page, and then I'm
 2 going to ask you whether this sounds like what was
 3 said when you met with the two special agents.
 4 A. (Looking at document.)
 5 MR. WEIDNER: You're asking whether or not
 6 that first half is what she said?
 7 BY MR. BOHL:
 8 Q. I want to know does it appear to you that this is
 9 the transcript, at least the first half of the
 10 page --
 11 A. Yes.
 12 Q. -- of what you said to the agents?
 13 A. It sounds just like the, yeah, the first meeting
 14 with them.
 15 Q. Let me ask you to go to page 19.
 16 A. Okay. (Witness complies.)
 17 Q. Now, about oh, three-quarters of the way down the
 18 page there's a sentence that begins "Person No. 1,
 19 colon, 'Okay.'" Do you see that?
 20 A. Okay.
 21 Q. And the transcript says:
 22 "Person No. 1: Okay. So to your knowledge,
 23 is there anyone from the Polk County Sheriff's
 24 Department that was aware of what had happened or
 25 what was going on," question mark.

Page 45

1 Under that it says:
 2 "M.J.J: As far as I know, nobody knew.
 3 "Person No. 1: Okay.
 4 "M.J.J: I would have thought that if anybody
 5 knew they would have stopped it."
 6 Did I read that correctly?
 7 A. Yes, you did.
 8 Q. Are you the M.J.J. in the transcript?
 9 A. I am.
 10 MR. WEIDNER: I'll -- I'll object as to
 11 foundation whether or not this is an accurate
 12 transcript.
 13 BY MR. BOHL:
 14 Q. You don't have a photographic memory and neither
 15 do I, but does this sound like about what you
 16 think you said?
 17 A. Yeah, roughly, yes.
 18 Q. Is it true that, as far as you know, nobody
 19 employed by Polk County knew you were having sex
 20 with Darryl Christensen?
 21 A. As far as I know, nobody knew.
 22 Q. Well, do you have any reason to think that maybe
 23 they knew, maybe somebody else knew?
 24 A. I can't say, because nobody was ever around. I
 25 don't know what cameras picked up, if cameras

Page 46

1 picked up anything. I'm not going to speculate.
 2 Q. From time to time Officer Christensen would ask
 3 you whether you were going to tell anybody; right?
 4 A. Yes.
 5 Q. How did you usually respond to that?
 6 A. I just said no.
 7 Q. While you were in the Polk County jail, you didn't
 8 report to anyone that you were having sex with
 9 Officer Christensen?
 10 A. No.
 11 Q. Why not?
 12 A. Because I was afraid that I would get -- there
 13 would be repercussions. I was already looking at
 14 ATRs and being pulled away from my children. The
 15 way I felt is I was going to be punished if
 16 anybody found out, because who are they going to
 17 believe, somebody who's got the power and the
 18 background, or the common criminal or supposed
 19 common criminal, with a bad rep, you know?
 20 Q. Now, during this period of time, were you
 21 represented by a lawyer?
 22 A. No.
 23 Q. You had been represented by a lawyer for the
 24 difficulties that got you incarcerated; right?
 25 A. I had public defenders.

Page 47

1 Q. And have you been represented by lawyers since you
 2 got out of Polk County jail?
 3 A. Only since this was brought up.
 4 Q. You had a probation and a parole agent?
 5 A. Yes, probation agent.
 6 Q. In the Polk County jail?
 7 A. Yeah, while I was still there.
 8 Q. Who was that?
 9 A. Juenai Boche.
 10 MR. WEIDNER: Can you spell that?
 11 THE WITNESS: J-U-E-N-A-I, and Boche is
 12 B-O-C-H-E.
 13 MR. WEIDNER: Thank you.
 14 BY MR. BOHL:
 15 Q. Did you tell Ms. Boche that you were having a
 16 sexual relationship with Darryl Christensen?
 17 A. No, I did not.
 18 Q. Why not?
 19 A. Because one of the issues that I was working
 20 through with my probation was because of my sexual
 21 behavior. I just, I was embarrassed by it, and
 22 like I said, I didn't believe anybody would ever
 23 believe me, so I just wanted it to go away.
 24 Q. Do you have any reason to believe, at all, that
 25 anyone employed by Polk County knew that you were

4/5/2016

Page 16

<p style="text-align: right;">Page 52</p> <p>1 somewhere in there.</p> <p>2 Q. Do you recall who told you this?</p> <p>3 A. I actually believe my ex-boyfriend did, because</p> <p>4 they went to school together.</p> <p>5 Q. Which boyfriend was this, now?</p> <p>6 A. My son's father.</p> <p>7 Q. And his first name was?</p> <p>8 A. David Sanders.</p> <p>9 Q. So David went to high school with Sgt. Casey?</p> <p>10 A. Yeah.</p> <p>11 Q. And you think David told you something about</p> <p>12 Sgt. Casey's suicide?</p> <p>13 A. Yeah.</p> <p>14 Q. What did he tell you?</p> <p>15 A. It was so long ago, all I recall is something</p> <p>16 about him having affairs with somebody in the jail</p> <p>17 and that he felt so regretful that he hung</p> <p>18 himself, or something along that line. Never, I</p> <p>19 don't remember going into any detail or anything</p> <p>20 else.</p> <p>21 Q. Okay. Let's leave Sgt. Casey, Mr. Jorgensen, and</p> <p>22 Mr. Christensen aside. Do you have any reason to</p> <p>23 believe that anybody else ever in the history of</p> <p>24 the world, a jail officer in Polk County, had</p> <p>25 sexual or improper relations with any other</p>	<p style="text-align: right;">Page 54</p> <p>1 A. Yes.</p> <p>2 Q. And you told them that you weren't.</p> <p>3 A. I did.</p> <p>4 Q. Why did you keep the secret from the other</p> <p>5 prisoners?</p> <p>6 A. Because I didn't want to be treated any different.</p> <p>7 I didn't want to be looked at differently. I</p> <p>8 didn't want to get in trouble. I was already</p> <p>9 pulled away from my kids and family. I didn't</p> <p>10 want anything more to happen.</p> <p>11 Q. Why did you think you would get in trouble if you</p> <p>12 reported advances from Darryl Christensen?</p> <p>13 A. Because of my history, my sexual history, and</p> <p>14 because of him being a jailer, like I said, who,</p> <p>15 who -- that that's just how I felt, is who are</p> <p>16 they going to believe, somebody who has the power</p> <p>17 and has an outstanding, you know, reputation, or</p> <p>18 somebody with a shitty reputation?</p> <p>19 Q. Well, when you met with the two special agents at</p> <p>20 the Office of Probation and Parole, you didn't</p> <p>21 hold anything back, did you?</p> <p>22 A. No, I did not.</p> <p>23 Q. Did you get in trouble?</p> <p>24 A. No. It was the first time I felt like I could</p> <p>25 talk about it.</p>
<p style="text-align: right;">Page 53</p> <p>1 prisoner?</p> <p>2 A. No.</p> <p>3 MR. WEIDNER: How about in her lifetime?</p> <p>4 MR. BOHL: Okay. I'll go with that.</p> <p>5 MR. WEIDNER: All right.</p> <p>6 THE WITNESS: Nothing that I'm aware of.</p> <p>7 BY MR. BOHL:</p> <p>8 Q. Nobody's ever even gossiped with you about</p> <p>9 anything else.</p> <p>10 A. No.</p> <p>11 Q. And when you were in the Polk County jail, having</p> <p>12 sexual relationships with Darryl Christensen, you</p> <p>13 never reported that to anybody?</p> <p>14 A. No, I did not.</p> <p>15 Q. As a matter of fact, you cooperated with Darryl</p> <p>16 Christian (sic) in keeping it secret.</p> <p>17 A. Yeah.</p> <p>18 Q. You cooperated with Darryl Christian in only</p> <p>19 having sex in places where you thought there were</p> <p>20 no cameras; right?</p> <p>21 A. Pretty much.</p> <p>22 Q. Now, I believe you said in your statement that</p> <p>23 some of your fellow prisoners asked you if you</p> <p>24 were having sex with a guard. And do you recall</p> <p>25 that?</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. Can you please explain to me why you thought you</p> <p>2 would get in trouble if you reported advances from</p> <p>3 Darryl Christensen in the Polk County jail, but</p> <p>4 you didn't think that later when you were on</p> <p>5 probation?</p> <p>6 A. Because when I was incarcerated already, I was</p> <p>7 afraid that I would get either a longer sentence</p> <p>8 or it would delay my ATR or something, something</p> <p>9 would happen that would delay me getting out to my</p> <p>10 family. So when I was out and able to talk to</p> <p>11 them one on one, as a civilian, I felt safer, I</p> <p>12 felt better, and I was able to see on their faces</p> <p>13 that they actually were concerned.</p> <p>14 Q. Do you know whether Darryl Christensen was having</p> <p>15 sexual or otherwise improper relations with any</p> <p>16 other prisoners?</p> <p>17 A. I do know of one.</p> <p>18 Q. Who was that?</p> <p>19 A. Jennie Johnson.</p> <p>20 Q. And how did you know about that?</p> <p>21 A. Actually, Jennie and I both talked about it.</p> <p>22 Q. Were you incarcerated with Jennie Johnson at the</p> <p>23 same time?</p> <p>24 A. Yes, a couple different times.</p> <p>25 Q. Did you know her from before you met in the jail?</p>

4/5/2016

Page 19

Page 64

1 Q. How did the sexual relationship between you and
2 Darryl Christensen begin?
3 A. To be honest, I can't pinpoint when. It started
4 off as just like sexual comments. And I don't
5 remember which day or anything like that, but I
6 just recall being called out and being behind the
7 pod. I honestly, it's kind of a blur to me.
8 Q. I've been there, so I think I can figure out the
9 areas you're talking about, but can you just
10 identify for me what you say, you were called out
11 and you were behind the pod?
12 A. When I was called out of the women's cell, I
13 walked over to the master bubble and walked to the
14 back of it where the door is, where he would meet
15 me.
16 Q. Before that had he made statements of a flattering
17 or sexual nature to you?
18 A. Yes.
19 Q. Tell me about that.
20 A. I would be walking and he would call over the
21 intercom and say that I looked sexy, or he would
22 just make different comments, like if we were
23 exercising to take our shirts off, or if we were
24 taking showers to leave the towel down so he could
25 see into the shower, and if we were putting lotion

Page 65

1 on he would ask for us to like just do it topless.
2 He would make comments like that.
3 Q. And there's one-way glass in max; right?
4 A. It's two-way glass. Well, I suppose, it's
5 supposed to be one-way, but you can see both ways.
6 Q. How -- well, I've been there but I haven't been on
7 the prisoner side.
8 A. Yeah.
9 Q. So tell me what you can see on the prisoner side.
10 A. If you've been in there long enough you can see
11 everything on the outside, and if they have the
12 lights on outside it illuminates everything, and
13 you can actually see everything very, very
14 clearly.
15 Q. Now, there's a light in the X room?
16 A. There's lights in the X room, there's lights in
17 the bubble. There was many times that Darryl
18 would sit up in the master bubble and have -- they
19 had a book lamp --
20 Q. Right.
21 A. -- and he would shine that on himself so that I
22 could, like --
23 Q. Okay. Now --
24 A. -- I could see directly in there.
25 Q. -- if the book lamp is off and the light in the

Page 66

1 X Room is off, what can a female prisoner in max
2 then see in the bubble? Anything?
3 A. If the lights are off?
4 Q. Yes.
5 A. You can't. Well, you can see everything else,
6 because then the lights aren't blinding you on the
7 inside, so you can see because the light's on the
8 outside. But they can't see in. They can't see
9 the movement in.
10 Q. Maybe I don't understand.
11 A. I think -- I feel it's if you maybe got that
12 backwards.
13 Q. I think I do. So why don't you -- why don't you
14 say it forwards.
15 A. There was times where Darryl would have me in the
16 X Room and he would know somebody was coming
17 through. He would turn the lights off in the
18 X Room so that nobody would know that I was in
19 there, because they couldn't see me in there, but
20 I could still see out.
21 Q. When you say somebody coming through you mean --
22 A. Another guard.
23 Q. -- coming through the walkway around the bubble.
24 A. I can't be for sure which way, but down one of the
25 two entrance hallways.

Page 67

1 Q. Okay. Now, it all started out with Darryl
2 Christensen making flattering statements of a
3 sexual nature. Is that, do I have that right?
4 A. Yes.
5 Q. And that led to something more; right?
6 A. Yes.
7 Q. Tell me about that.
8 A. It led to more physical sexual contact --
9 comments. And I, I honestly can't say how it
10 happened. It just did. I remember being out
11 behind the bubble and him touching me, and like
12 the first time him touching me I knew it wasn't
13 right. And then him asking me to, like, hold his
14 penis, and from there I honestly I can't say how
15 any more of that came about. It just did.
16 Q. When you were in the Polk County jail did you keep
17 a diary or notes or anything?
18 A. No, I did not.
19 Q. Did anybody?
20 A. I don't know.
21 Q. Are there any documents that we could find that
22 might give us details of when your relationship
23 with Darryl Christensen started?
24 A. I do know at the one time, this is my last
25 incarceration, I went -- before I went to

4/5/2016

Page 23

Page 80

1 Q. What kind of practitioner have you seen at Vantage
2 Point?
3 A. I think she's a psychologist.
4 Q. Has she prescribed any medication?
5 A. No.
6 Q. Are you done with your treatment at Vantage Point?
7 A. No, I need to go back. My vehicle situation, I
8 hadn't been able to make it back for another
9 appointment, but I'm working on that right now.
10 Q. And that has to do with the second OWI?
11 A. No, just because of financial reasons, vehicle's
12 not working.
13 Q. Why didn't you go to Vantage Point or someplace
14 like it before you filed the lawsuit?
15 A. Because I didn't feel that I needed psychological
16 help. My depression started to worsen and my --
17 and then anxiety set in, and I know now that I
18 seriously need help.
19 Q. Your past records, as far as I can recall, don't
20 have a diagnosis for anxiety. Is this something
21 new?
22 A. It is new.
23 Q. When did this start?
24 A. It started within the last year.
25 Q. When did you first talk to a healthcare

Page 81

1 practitioner about it?
2 A. It wasn't until about four, four months ago.
3 Q. It was after the lawsuit was filed.
4 A. Yeah.
5 Q. Is there any particular stressor that brings on
6 anxiety attacks?
7 A. Being around anybody talking about the case,
8 talking about any life events. It -- right now
9 pretty much everything brings on my anxiety.
10 Q. Is there any particular thing that you're anxious
11 is going to happen that you don't want to happen?
12 A. No. I just seriously feel as though I'm crawling
13 out of my skin and that everybody is looking at me
14 or talking about me, and I can't handle it.
15 Q. When was the first time you told the healthcare
16 practitioner that you were having problems with
17 anxiety?
18 A. It was actually when I first saw the psychologist
19 there. Otherwise I, when I was speaking to
20 Stephanie at Crime Victim, witness coordinator
21 lady in Madison, that's when I first brought up
22 that I was having the anxiety.
23 Q. Who referred you to Vantage Point?
24 A. Actually, Tom's law firm did.
25 Q. Now, getting back to the booking room, you had

Page 82

1 sexual intercourse with Mr. Christensen in a
2 holding cell in the booking room once.
3 A. Yes.
4 Q. It was just once.
5 A. Just once.
6 Q. And he came into the holding cell with a window,
7 and you didn't have any bottom on; right?
8 A. I was changing. He brought me the bottom, the
9 jail uniform bottoms. I was still in my jeans.
10 And his words were, "I'm assuming I don't have to
11 leave since I've seen this all before."
12 Q. And he also said, "Do you want to have sex."
13 A. He started touching me as I was undressing.
14 Q. Did he say, "Do you want to have sex?"
15 A. He didn't say it. It just kind of happened.
16 Q. And silly question, but it was just the two of you
17 in the cell.
18 A. Yes, it was.
19 Q. And as far as you know, nobody looked in the
20 window.
21 A. As far as I know.
22 Q. You didn't report this to anyone.
23 A. No, I did not.
24 Q. You were inebriated?
25 A. I was still intoxicated, yes.

Page 83

1 Q. How, in terms of numbers, how intoxicated were
2 you?
3 A. I don't know the numbers, but they had hooked me
4 up to a machine when I first got there that night
5 because I was very intoxicated, so if you got my
6 records from that, they would be able to tell you,
7 because I was brought in like 2:00 in the morning,
8 and that was roughly around 6, 6:30 in the morning
9 when the next shift came on when he came in, so
10 only four, four and a half hour difference.
11 Q. Now, were you booked?
12 A. Yes, I was booked.
13 Q. About how long did you stay in the Polk County
14 jail on that occasion?
15 A. I stayed until January, until I was transferred to
16 Taycheedah.
17 Q. Did you go to max?
18 A. Yes, I did.
19 Q. Now, other than the time you had sexual
20 intercourse in the booking room and the time that
21 you were in the pod or the X Room or the bubble
22 area, did you ever have sexual contact of any sort
23 whatsoever with Darryl Christensen anyplace else?
24 A. The X Room bathroom.
25 Q. Okay. Anyplace else?

4/5/2016

Page 24

<p style="text-align: right;">Page 84</p> <p>1 A. No.</p> <p>2 Q. Now, the X Room bathroom is right off the X Room.</p> <p>3 A. Yeah.</p> <p>4 Q. But you never had sex with Mr. Christensen outside</p> <p>5 the jail; right?</p> <p>6 A. No.</p> <p>7 Q. And you never had sex with him at any other place</p> <p>8 in the jail.</p> <p>9 A. No.</p> <p>10 Q. How many times did you have sex with</p> <p>11 Mr. Christensen in the X Room?</p> <p>12 A. I would have to say maybe a half dozen.</p> <p>13 Q. And was there some general way this would come</p> <p>14 about? Were you in there doing research?</p> <p>15 A. I would either be in there doing research, or he</p> <p>16 would call into the cell prior to me going over</p> <p>17 there and say, "Hey, you want to go put on a</p> <p>18 show," or "Do you want to go just play,"</p> <p>19 basically. So if I said yes, then he'd let me out</p> <p>20 and I'd go over there.</p> <p>21 Q. "Over there" being the X Room.</p> <p>22 A. Yeah.</p> <p>23 Q. So he would call you on the intercom; right?</p> <p>24 A. Yes.</p> <p>25 Q. And he'd ask you if you wanted to play.</p>	<p style="text-align: right;">Page 86</p> <p>1 A. No.</p> <p>2 Q. And there were no punishment type consequences if</p> <p>3 you said no.</p> <p>4 A. No.</p> <p>5 Q. So you've told us about one thing that would</p> <p>6 happen, that Darryl Christensen would call you on</p> <p>7 the intercom and ask you if you wanted to play,</p> <p>8 and you would go into the X Room and have sex;</p> <p>9 right?</p> <p>10 A. Yes.</p> <p>11 Q. And there were other occasions when you were in</p> <p>12 the X Room to do research.</p> <p>13 A. Yes.</p> <p>14 Q. And Mr. Christensen came in.</p> <p>15 A. Yes, or he would just call in and talk over the</p> <p>16 intercom.</p> <p>17 Q. In the X Room.</p> <p>18 A. And instruct me to do things.</p> <p>19 Q. Well, let's talk about the X Room now.</p> <p>20 A. Yeah.</p> <p>21 Q. Did this happen when you were in the X Room?</p> <p>22 A. Yes, that was.</p> <p>23 Q. Is there an intercom in the X Room?</p> <p>24 A. Yes, there is.</p> <p>25 Q. So you would be by yourself in the X Room.</p>
<p style="text-align: right;">Page 85</p> <p>1 A. Yeah.</p> <p>2 Q. And sometimes you said no.</p> <p>3 A. Yes.</p> <p>4 Q. Why was it that sometimes you said no and</p> <p>5 sometimes you said yes?</p> <p>6 A. Because sometimes I also realized that the other</p> <p>7 girls in the pod were awake and could -- kind of</p> <p>8 knew what was going on, and I didn't want to be</p> <p>9 labeled as anything.</p> <p>10 Q. You didn't want them to find out you were having</p> <p>11 sex --</p> <p>12 A. Basically.</p> <p>13 Q. -- with Darryl Christensen.</p> <p>14 A. Yes.</p> <p>15 Q. Excuse me?</p> <p>16 A. Yes.</p> <p>17 Q. Were there other reasons why sometimes you just</p> <p>18 said no?</p> <p>19 A. No.</p> <p>20 Q. When you said no were there any repercussions?</p> <p>21 A. He would playfully whine, pout, but other than</p> <p>22 that, no.</p> <p>23 Q. He tried to manipulate you. Yes?</p> <p>24 A. Yes.</p> <p>25 Q. But he didn't withhold breakfast.</p>	<p style="text-align: right;">Page 87</p> <p>1 A. Yes.</p> <p>2 Q. And what did he want you to do?</p> <p>3 A. Touch myself.</p> <p>4 Q. And these were occasions when you were</p> <p>5 legitimately in the X Room to do research.</p> <p>6 A. Yes.</p> <p>7 Q. About how many times do you think it happened that</p> <p>8 he asked you over the intercom to touch yourself</p> <p>9 in the X Room?</p> <p>10 A. Probably 20 or more.</p> <p>11 Q. About how many times did you have actual sexual</p> <p>12 conduct -- contact with Mr. Christensen in the X</p> <p>13 Room?</p> <p>14 A. Probably only a half a dozen.</p> <p>15 Q. Does that include the time in the bathroom?</p> <p>16 A. Yes.</p> <p>17 Q. What kind of sexual contact did you have with</p> <p>18 Mr. Christensen in the X Room?</p> <p>19 A. Performing oral sex.</p> <p>20 Q. Anything else?</p> <p>21 A. No.</p> <p>22 Q. Okay. Now, have you now told me about everything</p> <p>23 that happened of improper nature in the X Room or</p> <p>24 the X Room bathroom?</p> <p>25 A. Yes.</p>

4/5/2016

Page 25

Page 88

1 Q. Okay. Now, in the actual pod, the housing area,
2 did you ever have any sort of sexual contact with
3 Mr. Christensen?
4 A. Not actual physical contact in the pod.
5 Q. He never came into the pod to have sexual contact
6 with you.
7 A. No.
8 Q. What else happened in the pod that you think
9 shouldn't have happened?
10 A. I don't think anything should have happened in the
11 pod, but he would call in and he would have us,
12 have me, like, walk around without my shirt, or
13 the whole shower thing, because he could see
14 straight into the shower, or ask me to put lotion
15 on without, you know, without my top, and stuff
16 like that.
17 Q. And sometimes he asked you to have interaction
18 with one of the other prisoners.
19 A. There was one time he did.
20 Q. That just happened once.
21 A. That only happened once.
22 Q. Tell me about that. What happened?
23 A. He asked me and another girl to play cards without
24 our shirts and then made comments about actually,
25 like, kissing or actually fooling around, and

Page 89

1 neither of us would do that.
2 Q. But you did play cards.
3 A. We did.
4 Q. That just happened once.
5 A. Yes.
6 Q. There was never any physical contact with you and
7 another prisoner.
8 A. No.
9 Q. Okay. How about the area outside the X Room and
10 the pod and the bubble; there's like a little
11 walkway around the bubble; right?
12 A. Yeah.
13 Q. Did you ever have sexual contact with
14 Mr. Christensen in that area?
15 A. Yes.
16 Q. Tell me about that.
17 A. It was generally always right behind the bubble.
18 We'd walk -- there's -- when you come out of the
19 women's pod, there's a wall of the bubble where he
20 kind of sits. There's a gap in the window in the
21 wall that's like this. (Indicating.) And there
22 was times where he would stick his penis through
23 that hole to -- and have me touch it. Generally,
24 I would walk around the back of the bubble and he
25 would come out of the bubble, walk out the door,

Page 90

1 and he would wedge something in it so that he
2 could get back in and still be able to watch the
3 cameras, and that's pretty much where all the
4 sexual contact happened.
5 Q. So I didn't, I didn't follow all of that. There's
6 a door into the bubble.
7 A. Yes.
8 Q. In the back of the bubble.
9 A. Yes.
10 Q. And you would meet him outside the bubble, and he
11 would wedge the door open?
12 A. Yeah.
13 Q. And what was the first thing about a hole
14 someplace?
15 A. When -- all the way around their bubble there's a
16 gap in the window and the wall, so you can like
17 speak through, but he would sometimes put his
18 penis through there or put himself up against it
19 so that I could touch him.
20 Q. About how often did that happen?
21 A. I'd say 50 or more.
22 Q. Okay. And when you met him outside the bubble,
23 what happened when he wedged the door open?
24 A. Generally, I would be pushed up against the glass
25 and he would start touching me and kissing me, and

Page 91

1 it either led to oral sex or to actual sex.
2 Q. About how many times?
3 A. I'd say 50 or more.
4 Q. And I think you told me, if I understand
5 correctly, that there's no way for you to go back
6 and say exactly what happened during each
7 particular incarceration.
8 A. That's right.
9 Q. And there are no records we can consult about
10 that.
11 A. There -- well, you could get the records of each
12 separate incarceration from each probation hold,
13 even, which would pretty much tell us how many
14 times it happened. You know, I could get a better
15 record of how many times it happened, because it
16 was always at least once to twice during even a
17 six-day stay.
18 Q. Now, by the way, did other prisoners do research
19 in the X Room?
20 A. Yeah.
21 Q. How common was that? How often did the prisoners
22 want to do legal research?
23 A. I don't know how often. There's only one women's
24 cell, and you don't have contact with the men. So
25 for the women there wasn't that often, but I know

4/5/2016

Page 30

Page 108

1 A. Yeah, no.
 2 Q. Okay. To your knowledge, that's the same guy,
 3 Moseling.
 4 A. Yes.
 5 Q. Okay. All right. Did you see anybody else for
 6 counseling at Taycheedah other than Moseling?
 7 A. No.
 8 Q. That's all I have.
 9 MS. LUBINSKY: I don't have anything.
 10 RE-EXAMINATION
 11 BY MR. BOHL:
 12 Q. I've just got a couple of questions. Did Darryl
 13 Christensen ever tell you that if it became known
 14 that you two were having sexual relationships,
 15 that he would lose his wife and children?
 16 A. He did. He said he would lose his tenure.
 17 Q. His tenure?
 18 A. Yeah, because he had like 20 years in here.
 19 Q. Do you recall where you were when he told you
 20 that?
 21 A. Standing near the bubble.
 22 Q. And he asked that you not tell anyone.
 23 A. He stressed it every time.
 24 Q. How did you get here today?
 25 A. My aunt drove me.

Page 109

1 Q. She's going to drive you home?
 2 A. Yes.
 3 Q. That's all I have. Thank you.
 4 A. Thank you.
 5 THE VIDEOGRAPHER: This concludes Disk
 6 No. 2 of the videotape deposition of I *MJJ*
 7 We're going off the record at 2:45 p.m.
 8
 9 (WHEREUPON, at approximately 2:45 p.m.
 10 the foregoing deposition was concluded.)
 11 (The ORIGINAL EXHIBITS were attached to
 12 the ORIGINAL TRANSCRIPT)
 13 (The ORIGINAL TRANSCRIPT was provided to
 14 ATTORNEY BOHL and copies to ATTORNEYS De VRIES,
 15 WEIDNER, AND LUBINSKY.)
 16 ** (END OF RECORD) **
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Page 110

ERRATA SHEET		
Page/Ln	Correction	Reason Change
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Page 111

1 I, *MJJ*, have read this
 2 deposition transcript pages 1 - 110 and
 3 acknowledge herein its accuracy except as noted on
 4 the errata sheet.
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Signature

Notary Public